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*Counsel for Plaintiff
Viral DRM LLC*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

VIRAL DRM LLC,
Plaintiff,
v.
YOUTUBE UPLOADERS LISTED ON
SCHEDULE A,
Defendant

CASE NO.: 3:23-CV-05977-JSC; 3:23-CV-06261-JSC; 3:23-CV-06598-JSC

**NOTICE UPDATING THE COURT ON
PLAINTIFF'S INTENT REGARDING
MATTERS CV-05977; CV-06261; AND CV-
06598**

The Honorable Jacqueline Scott Corley

PLAINTIFF Viral DRM LLC (“Viral DRM”), by and through its undersigned counsel, hereby submits this Notice updating the Court on Plaintiff’s Intent to Proceed with the following matters: 1) 3:23-CV-05977-JSC; 2) 3:23-CV-06261-JSC; and 3) 3:23-CV-06598-JSC.

I. Motions for Subpoena

a. 3:23-cv-05977

On January 3, 2024, Plaintiff’s Counsel, Matthew Rollin, and Google’s Counsel, David Kramer, met and conferred via telephone as Ordered by the Court in ECF 11. Plaintiff filed a revised Proposed Order on January 16, 2024, at ECF 15. Plaintiff would like to proceed with the Motion for Subpoena. If the Court grants the motion, and once Google provides Plaintiff with the requested

information, Plaintiff will determine which entities are subject to the Court's jurisdiction, file new complaints against those entities and dismiss the remaining parties from the action.

b. 3:23-cv-06261

On January 3, 2024, Plaintiff's Counsel, Matthew Rollin, and Google's Counsel, David Kramer, met and conferred via telephone as Ordered by the Court in ECF 16. Plaintiff filed a revised Proposed Order on January 16, 2024, at ECF 19. Plaintiff would like to proceed with the Motion for Subpoena. If the Court grants the motion, and once Google provides Plaintiff with the requested information, Plaintiff will determine which entities are subject to the Court's jurisdiction, file new complaints against those entities and dismiss the remaining parties from the action.

c. 3:23-cv-06598

It is Plaintiff's intent to file a similar Motion for Subpoena in 3:23-cv-06598. If the Court grants the motion, and once Google provides Plaintiff with the requested information, Plaintiff will determine which entities are subject to the Court's jurisdiction, file new complaints against those entities and dismiss the remaining parties from the action.

DATED: February 27, 2024

Respectfully submitted,

/s/ Matthew L. Rollin
MATTHEW L. ROLLIN
SRIPLAW, P.A.
Counsel for Plaintiff Viral DRM LLC